

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Dean D. Hunt
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

MATHEW AND EVELYN BROMS INVESTMENT
PARTNERSHIP; MATHEW BROMS REVOCABLE

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04985 (SMB)

TRUST, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; MATHEW BROMS MARITAL TRUST A U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; MATHEW BROMS CREDIT TRUST U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; EVELYN BROMS REVOCABLE TRUST U/A DATED 1/10/74, in its capacity as a Partner of the Mathew and Evelyn Broms Investment Partnership; RICHARD BROMS, in his capacity as Trustee for the Mathew Broms Revocable Trust, Mathew Broms Marital Trust A u/a dated 1/10/74, Mathew Broms Credit Trust u/a dated 1/10/74, and Evelyn Broms Revocable Trust u/a dated 1/10/74; IRREVOCABLE TRUST FOR THE BENEFIT OF ALISON SARAH BROMS DTD 11/7/1984, in its capacity as a Partner in the Mathew and Evelyn Broms Investment Partnership; and THOMAS MOSCOE, in his capacity as Trustee for the Irrevocable Trust for the Benefit of Alison Sarah Broms dtd 11/17/1984,

Defendants.

THIRD AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were due: April 30, 2014
2. Fact Discovery shall be completed by: September 4, 2015
3. The Disclosure of Case-in-Chief Experts shall be due: February 10, 2016
4. The Disclosure of Rebuttal Experts shall be due: March 11, 2016

5. The Deadline for Completion of Expert Discovery shall be: June 9, 2016
6. The Deadline for Mediation Referral shall be: August 8, 2016.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: August 22, 2016
8. The Deadline for Conclusion of Mediation shall be: December 20, 2016

New York, New York
April 7, 2015

Of Counsel:

BAKER & HOSTETLER LLP
811 Main Street, Suite 1100
Houston, Texas 77002-5018
Telephone: 713.751.1600
Facsimile: 713.751.1717
Dean D. Hunt
Email: dhunt@bakerlaw.com

By: /s/ Nicholas Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*